



July 31, 2025

Hon. Ona T. Wang  
Magistrate Judge  
500 Pearl St.  
New York, NY 10007

**Re: *New York Legal Assistance Group v. Social Security Administration*, No. 23 Civ. 9363**

Dear Judge Wang:

Plaintiff New York Legal Assistance Group (“NYLAG”) writes pursuant to the Court’s June 2, 2025, order, ECF No. 66, directing the Parties to provide a status letter by July 31, 2025.

In the past month, the Parties have continued to meet and confer and have agreed to pursue the possibility of a full resolution of this case. By way of background, this case involves two categories of “programmatic” disputes: claims regarding SSA’s proactive disclosure requirements under the Freedom of Information Act (Claim 5), and claims regarding SSA’s policies and practices of granting or denying fee waivers under the Act. The Parties submitted a Stipulation of Settlement regarding Claim 5 to the Court on June 27, 2025, which remains pending. Meanwhile, the Parties have continued to confer and have agreed to continue pursuing the possibility of a resolution regarding SSA’s policies and practices of granting or denying fee waivers.

Accordingly, the Parties respectfully request leave to file another status letter with the Court on or before September 8, 2025. At that time, the Parties expect that they will be able to either advise the Court that a resolution of the fee waiver claim is likely, or propose a briefing schedule for summary judgment motion practice.

Respectfully submitted,

/s/Kate Fetrow  
Danielle Tarantolo  
Kate Fetrow  
New York Legal Assistance Group  
*Counsel for Plaintiff*